

Exhibit D

DECLARATION OF SCOTT CAMPBELL

Now comes declarant Scott Campbell and, under penalty of perjury, states as follows:

1. I am over the age of 18 and fully competent to testify to the statements and facts contained herein, and I have personal knowledge of all of them.

2. I am an elector of the State of Ohio, residing in Cleveland Heights, Ohio. I am an attorney in a senior position at a major Ohio employer.

3. Voting rights are a matter of critical importance to me. I feel very strongly that the right to access the ballot is fundamental to our system of government, and is a critical guarantor of the other rights that we enjoy. I make it a point to vote in every primary and general election. It disturbs me that people who are less fortunate than myself, or who belong to minority groups, frequently suffer disenfranchisement. Accordingly, it is very important to me to see that access to the ballot is made easier.

4. I am familiar with the subject matter of the proposed "Secure and Fair Elections Amendment" to the Ohio Constitution that is being advanced by Ohioans for Secure and Fair Elections (the "Proposed Amendment"), and I enthusiastically support it.

5. Until the COVID-19 pandemic, I would certainly have signed a petition to put the Proposed Amendment on the November 3, 2020 general election ballot if asked by a circulator.

6. I am a very close follower of the news, particularly CNN, the New York Times, the Wall Street Journal, and the Cleveland Plain Dealer. Since at least mid-February of 2020, I have been aware that there is a highly contagious infectious disease, COVID-19, caused by a coronavirus, spreading throughout parts of the world including the United States, and now Ohio.

7. I have kept abreast of news updates relating to the coronavirus in February and March of 2020, including that the coronavirus is considered a global pandemic, and that the

Centers for Disease Control and Prevention (CDC), Ohio Department of Health (ODH), and others have issued recommendations to avoid large gatherings and even avoid approaching within 6 feet of any person.

8. As the COVID-19 pandemic has escalated, I've also become concerned about news reports that healthcare measures, such as access to ventilators, may be rationed based on a patient's age and risk factors. I am 57 years old, and although I am in good health generally, I would never want to chance being put in a situation where healthcare was not made available to me because of my age or any other perceived risk factors.

9. Out of concern for my health and the health of others, I have been carefully complying with the recommendations of the CDC, ODH, and others where at all possible, including maintaining social distancing, staying at home as much as possible, and maintaining a minimum six-foot distance from anyone outside my household, which consists only of myself and my wife.

10. March 13 was the last day that I worked in my office. During that week, based on the news reports that I was seeing, I realized that social distancing would become necessary to protect myself, as well as others. I've also paid close attention to Governor DeWine's and ODH Director Acton's announcements of protective measures.

11. Since March 13, I have been working from home and have left my home only a few times—approximately 12-15 times in the past 7 weeks. Each time, I've only gone for a neighborhood walk or to an area park, while being careful to maintain distance from others and avoid face-to-face interaction. Our house shares a driveway with a neighbor's house, but even with my neighbor, I've only exchanged a few words from a distance.

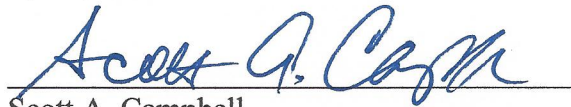
12. I believe that social distancing measures like these are necessary, as numerous public officials have advised, not only to protect my own health but to help reduce the spread and impact of the coronavirus—in other words, to “flatten the curve.” I believe it is my obligation to others to do my part to contain this pandemic, including by staying home and avoiding all unnecessary face-to-face contact.

13. If a petition circulator for the Proposed Amendment were to come to my door, I would not engage with them and would not sign the petition, out of concern for my health and the health of others. I believe that kind of face-to-face contact would present an undue risk that I do not want to take, even though the subject matter of the Proposed Amendment is very important to me.

14. Were I provided with the means to sign a petition for the Proposed Amendment electronically, remotely, by proxy, or by other means that would not present a risk to my health or others’, I would absolutely do so.

I declare under penalty of perjury that the foregoing is true and accurate.

Executed on April 29, 2020.



Scott A. Campbell